IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Robert B. McConnell aka Robert Bruce McConnell dba McConnell's Refrigeration

Chapter 13

Debtors.

Case No.: 16-11534-elf

Nationstar Mortgage LLC,

Movant,

Robert B. McConnell aka Robert Bruce McConnell dba

Hearing Date: March 28, 2017

Time: 9:30 am

McConnell's Refrigeration,

Location: Courtroom 1

Debtors / Respondents,

and

VS.

William C. Miller,

Trustee / Respondent.

shacht.

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Nationstar Mortgage LLC has filed a Motion for Relief from the Automatic Stay with the Court for leave to enforce its rights as determined by state and/or other applicable law with regard to real property.

<u>Your rights may be affected.</u> You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **March 21, 2017**, you or your attorney must do <u>all</u> of the following:
 - (a) file an answer explaining your position at:

United States Bankruptcy Court Eastern District of Pennsylvania Office of the Clerk 900 Market Street Philadelphia, PA 19107 (b) mail a copy to the Movant's attorney:

Matthew C. Waldt, Esquire Milstead & Associates, LLC 1 East Stow Road Marlton, NJ 08053 Phone No.: 856-482-1400 Fax No.: 856-482-9190

(c) mail a copy to the Chapter 13 Trustee:

William C. Miller, Trustee Chapter 13 Trustee 1234 Market Street Suite 1813 Philadelphia, PA 19107

- 2. If you or your attorney do not take the steps described in paragraphs 1(a), 1(b) and 1(c) above and attend the hearing, the court may enter an order granting the relief requested in the Motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on **March 28, 2017 at 9:30 a.m.** in Courtroom 1, Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.
- 4. If a copy of the Motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at 215-908-2801 to find out whether the hearing has been cancelled because no one filed an answer to the Motion.

Respectfully submitted, MILSTEAD & ASSOCIATES, LLC

DATED: March 3, 2017

/s/Matthew C. Waldt
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Attorneys for Movant